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Attorneys for Defendants Salt Lake City and Officer Clinton Fox

**IN THE UNITED STATES DISTRICT COURT
STATE OF UTAH, CENTRAL DIVISION**

ESTATE OF PATRICK HARMON SR.;
PATRICK HARMON II, as Personal
Representative of the Estate of Patrick Harmon
Sr., and heir of Patrick Harmon Sr., TASHA
SMITH, as heir of Patrick Harmon, Sr.,

Plaintiffs,

vs.

SALT LAKE CITY, a municipality; and
OFFICER CLINTON FOX, in his individual
capacity,

Defendants.

Case No. 2:19-cv-00553-HCN-CMR

**STIPULATED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS TO FILE REPLY TO
MOTION TO RECONSIDER ORDER
OF REMAND**

Judge Howard C. Nielson, Jr.

Magistrate Judge Cecilia M. Romero

The Parties hereby stipulate and jointly move the Court to extend the time for Defendants to file a Reply Memorandum in support of their Motion to Reconsider Order of Remand, (ECF No. 51), up to and including March 2, 2022. The Reply is currently due on February 18, 2022, and thus the time to file has not yet expired. There is good cause to grant the extension because the Motion presents important and complex issues of judicial discretion and jurisdiction and due to Defendants' counsel's commitments on other cases and scheduled travel.

Therefore, undersigned counsel stipulate to and request an extension of the deadline to file the Reply up to and including March 2, 2022. The extension is not requested for an improper purpose and will not unduly delay resolution of this action. A proposed order granting this stipulated motion is filed contemporaneously herewith.

DATED: February 16, 2022.

DEISS LAW PC

SALT LAKE CITY CORPORATION

/s/ Corey D. Riley
(signed with permission by e-mail)
Andrew G. Deiss
Corey D. Riley

/s/ Katherine R. Nichols
KATHERINE R. NICHOLS
Attorney for Defendants

RATHOD | MOHAMEDBHAI LLC
Qusair Mohamedbhai
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court, which sent notice to:

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/s/ Heidi Medrano